1.5 Impacts of Regulatory Activities and Industry

1.5.1 Regulatory Impacts

Mitretek will continually monitor regulatory initiatives which may affect the administration of NANP resources. Mitretek will make appropriate modifications to the NANP Administration procedures as directed by regulatory initiative and approved by the NANC.

1.5.2 Industry Numbering Committee Changes to Number Resource Assignment Guidelines

Mitretek is well aware of the activities of the Industry Numbering Committee (INC).

Mitretek has monitored the INC since its inception and has attended its most recent sessions. Members of the Mitretek team include people who helped develop INC guidelines and who have been active participants in INC. More generally, Mitretek has tracked and attended meetings of many Alliance of Telecommunications Industry Solutions (ATIS) committees and subcommittees, including T1, TCIF, and CLC/OBF. Mitretek is familiar with the role of ATIS in the telecommunications industry and welcomes the close interaction with ATIS committees and their subtending groups. Mitretek especially welcomes the interaction it will enjoy with the industry numbering experts assembled in INC. Mitretek similarly looks forward to the insights of the NANC and the FCC in directing its interaction with industry fora, such as INC.

Mitretek will be in attendance at all regularly scheduled INC meetings throughout its tenure as the new NANP Administration. Mitretek is aware of INC procedures including the function of initial closure and final closure. Mitretek will use its vigilant tracking of INC activities to jump-start any necessary changes to resource estimations. Mitretek will, within 10 business days, assess the impact of changes to numbering resource plans, administrative directives, assignment guidelines, and procedures on its operations.

Mitretek will advise the INC, the NANC, and the FCC of any changes that are required. Mitretek will provided written notice explaining why the changes are necessary. Mitretek welcomes the input and oversight of the NANC and FCC in determining such changes and appropriate cost recovery adjustments. Mitretek is aware of an ongoing dialog between INC and the NANC in one potential change, that of the new NANP Administration taking on the role of INC secretary. Mitretek welcomes this as a potential 'test case' to show its ability to adapt to new industry needs in a timely and orderly fashion.

1.6 Performance Review Process

Mitretek proposes a Performance Review Process that reports performance statistics to the NANC on a quarterly basis and surveys the industry on an annual basis, as well as ad hoc problem reporting.

Quarterly Performance Reports

Mitretek will provide Quarterly Performance Reports to the NANC reporting on significant activities, timely policy and Guidelines issues, exceptional resource status reports, and measurement against stated Performance Measures for all NANP Administration activities for the preceding quarter.

Mitretek will develop clear, consistent, performance measures in collaboration with the NANC in order to best monitor and document its performance as the new NANP Administration. Monitoring of the performance of the new NANP Administration shall include performance of tasks in accordance with performance measurements established in the NANC Requirements Document. At this time, Mitretek recommends, for the NANC's consideration, the following performance measures:

- 1. Application for a Numbering Resource (i.e. NPA, NXX, CIC code)
- Confirm receipt of application within 1 business day
- Process application within 10 working days (specifically, number of applications assigned, denied, referred)

- 2. Request for information and assistance
- Acknowledge within 2 working days
- Respond within 10 working days
- Input of Routing Data Base System/ Bellcore Rating Input Database System
 (RDBS/BRIDS) assignment information for NXXs in geographic NPAs
- Performed concurrent with code assignment
- Perform within 10 working days
- 4. Updates to Web site information
- Performed daily
- Database updates to website within 2 working days
- Paper copies of updated website information sent within 2 working days

Mitretek will monitor and document its work on the basis of these performance measures and provide quarterly reporting on significant activities (such as, number of CICs issued, number of NPA activities begun), timely policy and Guideline issues, exceptional resource status reports, and measurement against the performance measures. At the discretion of the NANC, these reports may be posted to the web site.

In addition to these performance measures, the quarterly report will also include written summaries of issues that require policy level attention; matters requiring Guideline interpretation, amendment, or development with INC or other industry fora; NPA

jeopardy identifications; resource issues; communications with regulatory bodies; and, the status of enterprise services.

Annual Report and Industry Survey

Monthly management reports will provide the basis, in part, for the NANP Administration Annual Report to the NANC on its performance and the status of NANP numbering resources. This report will include maps, number utilization across industry sectors, exhaust trends, expansion plans, and other pertinent data. Additionally, Mitretek will contract with an unbiased third party (such as the Dun and Bradstreet survey mentioned in Overview of this response) to perform an evaluation of its services using a survey of industry and will submit the results of the report in the Annual Report. This survey will solicit an evaluation of its performance continually upon completion of service from a selected range of clients requesting NANP and COCA services. Additionally, Mitretek will conduct an annual audit of enterprise services revenues. This audit will be conducted by the firm that prepares the corporate financial statements, and include in the NANP Administration Annual Report.

Ad Hoc Reports

The Mitretek NANP Administration will report and aggressively address all performance problems identified by telecommunications industry participants. Should problems be identified, Mitretek will investigate and report to the NANC within 10 business days on

the nature, status and suggested remediation of identified problems. Upon consultation with the NANC Mitretek will take corrective action to ensure the remediation of the current problem and the prevention of future similar problems. The problems and resulting actions will also be reported in the Quarterly Report.

1.7 Termination for Non-Performance

Mitretek will provide NANP Administration functions in a high-quality, responsive manner. We possess the organizational and staff experience and capabilities to perform the NANP Administration function. Nevertheless, we understand that if the NANC determines at any time that the new NANP Administration substantially or materially defaults in performing its obligations, the NANC shall immediately advise the new NANP Administration of the default, request immediate action to correct the performance, permit the new NANP Administration reasonable time to correct its performance, and/or recommend to the FCC and other appropriate regulatory bodies termination of the Term of Administration of the new NANP Administration. Mitretek understands this process and commits to providing services that will not necessitate its use.

1.8 Preparation and Submission of Proposals

Mitretek is pleased to provide the NANC, and all NANP member countries, a response to its NANP Administration Requirements Document. We look forward to working with the NANC and all NANP member countries in this NANP Administration initiative to better allocate the vital and strategic public numbering resource. Our proposal addresses and complies will all requirements set forth in the Requirements Document, including the format requirements stated in Section 2.

Dr. H. Gilbert Miller is an officer of the corporation and a duly authorized representative of Mitretek Systems, Incorporated. ■

I, H. Gilbert Miller, am the corporate officer responsible for the preparation of this response to the North American Numbering Council. Furthermore, I am a duly authorized representative of Mitretek Systems, Incorporated. I have personally participated in the preparation and review of this proposal. I commit Mitretek to the implementation of the NANP Administration role as presented in this response.

Dr. H. Gilbert Miller

Vice President

Center for Telecommunications and Advanced Technology
Mitretek Systems

Concur:

Dr. Lydia W. Thomas

President and Chief Executive Officer

Mitretek Systems

1.9 Evaluation of Proposals

1.9.1 Evaluation Process

Mitretek has prepared our response to be responsive to the NANC's Requirements

Document. We have taken every opportunity to present our qualifications to perform the

NANP Administration functions. Throughout our proposal, we have organized our

presentation to be supportive of the evaluation that the NANC, and its working groups,

will conduct.

The Mitretek response complies with the schedule for assuming NANPA responsibilities as ordered by the FCC (NANC Requirements Document Sections 4.3 and 5.3; CC Docket No. 92-237, FCC 95-283; CC Docket No. 96-98, FCC 96-333). The Mitretek response is compliant with all requirements as demonstrated through the Compliance Matrix. The Mitretek Compliance Matrix is enclosed. The Mitretek price proposal is presented in Response Section 10. Mitretek is prepared to answer any questions of the NANC and its working groups or evaluators. Mitretek is prepared to participate in any meeting of the NANC and its working groups or evaluators. Mitretek is prepared to respond to any additional request of the NANC.

1.9.2 Evaluation Criteria

The Mitretek proposal was written to address the following aspects of each requirement:

Compliance. Mitretek is prepared to take on the role of NANP Administration as specified in the Requirements Document. The Mitretek response is completely compliant with each requirement. We take no exceptions to the Requirements Document. We are prepared to implement the new NANP Administration through rules to be promulgated by the FCC. The enclosed Compliance Matrix directs the reader to the appropriate section dealing with each requirement.

Experience. Mitretek presents throughout our response supporting material to demonstrate that the necessary skills and accumulated knowledge described in Requirements Document Section 3.0 (Qualities and Attributes) and adequate staffing are met, as well as the functions and responsibilities outlined in Requirements Document Sections 4.0 to 9.0. Mitretek recognizes that all requirements contained in the Requirements Document derive from other documents, including the Administration of the North American Numbering Plan, Report and Order, FCC Docket No. 92-237, 13 July 1995.

Completeness. Mitretek presents a detailed discussion of our approach. We have conducted many supporting analyses (such as the frequency of NPA relief planning activities over time, workload associated with each NANPA and COCA function) in the course of preparing our proposal. We have included the results of these analyses where appropriate.

Communication Effectiveness. Mitretek prepared a response to communicate clearly and concisely to broad audiences with varying degrees of knowledge. We have used several vehicles to accomplish this, including a separate overview concisely presenting our response, and the use of appendices to present details and supporting material to the response.

Innovation. Mitretek believes that we have provided a response that is significantly innovative in the areas of:

- Neutrality of the new NANP Administration to ensure not only non-discriminatory
 administration, but also a willingness by industry to provide much needed quality data
 to the NANP Administration.
- The use of information technology to increase the efficiency, flexibility, and communication of all NANPA and COCA functions.
- The introduction of sophisticated models and tools for forecasting, analysis, number allocation, administration, and relief planning.
- Commitment of experienced numbering plan experts and administrators to the Mitretek NANP Administration. These identified numbering plan experts and administrators will complement the Mitretek experts in forecasting, telecommunications technology, telecommunications rating, price and requirements, and development of reliable computer systems with extremely large databases. The identified and commitment numbering experts and Mitretek experts will be later

complemented by other experts already identified and contacted by an executive search firm already functioning for Mitretek.

- Mitretek brings the appropriate corporate and staff experience required for NANP
 Administration in a changing telecommunications industry and market.
- Mitretek provides a logical, incremental transition strategy that will ensure a smooth,
 error-free, seamless transition.
- Mitretek's not-for-profit structure and cost-efficient operation provides a fair and reasonable price.

1.10 Schedule

Mitretek understands that the schedule contained in Section 1.10 of the Requirements

Document defines the schedule for NANC activities. Mitretek is prepared to support that
schedule. Figure 1-3 presents the schedule of possible Mitretek activities, based on the
schedule contained in the Requirements Document. Mitretek understands that the NANC
intends to make its recommendation to the FCC and other appropriate regulatory
authorities on 15 May 1997. We are prepared to perform all of the activities required to
ensure that this schedule is met. Mitretek is prepared to advance the schedule in any
manner that supports the NANC and FCC in better meeting its goals and objectives. ■

Event	Date
Closing Date for Respondent Proposals	3-Apr-97
NANPA WG Distributes Questions to Mitretek via Facsimile (if any)	17-Apr-97
Mitretek Answers NANPA Working Group (WG) Questions	24-Apr-97
NANPA WG Individual Meeting with Mitretek	2-May-97
NANPA WG Recommendation of Respondent(s) to NANC Steering	9-May-97
Committee	
NANC Steering Committee Review of NANPA WG Recommendation of	13-May-97
Respondent(s)	
NANC Review of NANC Steering Committee Recommendation of	14-May-97
Respondent(s)	
NANC Recommendation of new NANPA and Billing and Collection Agent	15-May-97
to FCC and Other Appropriate Regulatory Authorities	

Figure 1-3. Schedule of Possible Mitretek Activities

1.11 Confidentiality and Use of Information

Mitretek understands that we are to use the Requirements Document and any other information furnished to us under this Requirements Document solely for the purposes of responding to the Requirements Document. Mitretek will only reproduce any part of the Requirements Document for the purpose of preparing our response.

Mitretek will issue no publicity or news releases pertaining to this Requirements

Document. Mitretek understands that responses to this Requirements Document or

discussions of any kind regarding the Requirements Document or notice of the selection of
a respondent may be released only with the prior written approval of the NANC.

1.12 Inquiries

Mitretek will continue to direct all questions, matters, and concerns related to the Requirements Document to the NANC Chair. We will continue to forward in writing to the following address.

Alan Hasselwander
Chair, North American Numbering Council c/o
Federal Communications Commission
Common Carrier Bureau
Network Services Division
2000 M Street, NW
Suite 235
Washington, DC 20554

We will continue to simultaneously submit a copy of all correspondence to the Chair of the North American Numbering Council to Marian Gordon, Designated Federal Official to the NANC, Federal Communications Commission at the address stated above.

Mitretek understands that in the interest of fairness, all correspondence submitted to the Chair will be made public. Appendix F contains all correspondence already provided to the FCC or the NANC.

2.0 Proposal Outline and Respondent Information

This Mitretek proposal is organized to comply with all outline and information requirements specified in Section 2.0 of the NANC Requirements Document.

2.1 Respondent Confidential Information

Mitretek understands that material contained in this proposal is subject to 5 USC 552 (Freedom of Information Act). We request that all information contained in this proposal be considered "confidential." We will submit, in accordance with the NANC's schedule, a redacted version of our proposal. Mitretek understands that this redacted version will be used to satisfy requests made under the Freedom of Information Act. ■

3.0 NANPA Qualities and Attributes

Mitretek will provide the NANC required NANP Administration qualities and attributes in one, or more, of four ways. The required quality or attribute:

- Exists in the committed Mitretek NANP Administration team
- Exists in the Mitretek support groups
- Exists in recently acquired numbering plan experts
- Will be acquired via staffing plan already implemented

Figure 3-1 shows how each quality or attribute will be provided. Prior to discussing each attribute, each of these four possible ways is now discussed.

Exists in Committed Teams. In the fall of 1996, Mitretek began to assemble a team that would lead our efforts to become the new NANP Administration. This team was selected from telecommunications professionals in our Center for Telecommunications and Advanced Technology. The Center for Telecommunications and Advanced Technology capability was previously discussed in the Description of Mitretek Business located in the Respondent Information Section. Center for Telecommunications and Advanced Technology staff have a long history of developing and helping to operate telecommunications networks. We continually address a broad scope of technologies and operational functions that we have addressed for our clients. The committed NANP Administration team has been working for a considerable time to:

Quality, Attribute, or Capability	Exists in Mitretek	Mitretek Support Groups	Recently Acquired	Plan to Acquire Begun
Knowledge about telecommunications network operations and NANP numbering resources				
2. Act as an information resource for all aspects of numbering				
Develop, operate and maintain the computer-based systems required for NANPA and COCA functions				·
4. Management skills (e.g., to manage the new NANPA organization)				
5. Project management skills (e.g., to plan NPA relief, to prepare COCUS)				
6. Interpersonal communication and negotiation skills (e.g., to facilitate and participate in industry activities, maintain effective relations)				
7. Manage proprietary data and competitively sensitive information				
8. Public relations skills (e.g., to explain complex numbering issues to the media and the public				
9. Compliance resources (i.e., ensure compliance with all applicable laws)				

Figure 3-1. Mitretek Already Possesses All Required Attributes and Qualities

- Prepare this proposal for the new NANP Administration
- Begin development of computer systems and databases required for NANP
 Administration
- Train staff in NANPA and COCA functions
- Plan, in detail, for the implementation of the new NANP Administration

The committed NANP Administration team also:

- Began attending all meetings of the numbering plan community, including meetings of the INC, the NANC, its Steering Group and working groups. We attended 34 meetings in Washington, DC, 18 meetings outside of Washington, DC, and participated in 29 conference calls.
- Sent staff to the NANP training courses recently held in San Francisco and Atlanta
 In addition to telecommunications professionals, the committed team also includes staff
 experienced in information systems and database development and operations.

Mitretek staff have considerable telecommunications industry experience. Staff typically join Mitretek after considerable experience in industry. Table 3-1 presents representative Center for Telecommunications and Advanced Technology staff and their previous industry positions.



Exists in Mitretek Support Groups. Figure 3-2 presents the Mitretek support groups that will be available to the Mitretek NANP Administration on an as-needed and as-planned basis. These support groups include technology experts from the Technical Resource Center (as described in Description of Mitretek's Business in the Respondent Information section), as well as other specialists such as legal support from the Mitretek General Counsel and public relations support from the Mitretek Corporate Communications.

Mitretek support group resources will be effective for the new NANP Administration because:

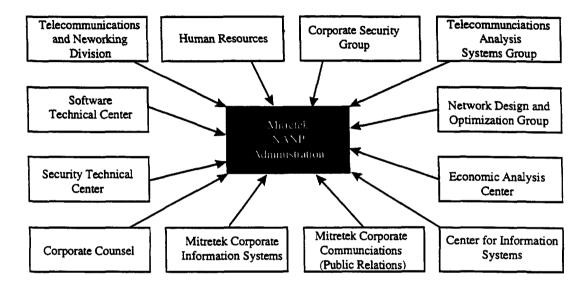


Figure 3-2. Mitretek's Matrixed Support Will Provide Resources to the NANP Administration on an As-Needed and As-Planned Basis

- Providing resources, both technical and administration, and professional and support,
 on a matrixed basis is a practice finely-tuned over more than a decade of experience in
 resource sharing at Mitretek
- Providing resources ensures that the best possible resources of that type from throughout the corporation are brought to bear for the NANP Administration
- Mitretek's characteristics and practices for a neutral, conflict-of-interest-free
 environment are provided on a total-corporate basis (that is, the complete Mitretek
 organization operates under the same corporate practices as that of the proposed
 NANP Administration)

The following organizations, in particular, provide specialized skills that can significantly support the NANP Administration:

- 1. Telecommunications and Networking Division This sister division in the Center for Telecommunications and Advanced Technology provides the full range of telecommunications support services to its clients. Areas of expertise include telecommunications strategic planning, requirements and technology forecasting, architecture and network design, service pricing, procurement support, and implementation planning. The telecommunications engineers in this division have extensive carrier experience in network planning, engineering, operations, and maintenance. This division also includes the Telecommunications Analysis Software Group and the Network Design and Optimization Group.
- 2. Software Technical Center This center maintains state-of-the-art skills in the leading edge software technologies in today's marketplace. In particular, the personnel from this center bring expertise in large database systems and data modeling, the latest client/server and collaborative computing technologies, and extensive experience in applications development. The center is also the home of the Intranet Development Facility, which brings the latest World Wide Web technology to the solution of the customer's information system problems.
- Security Technical Center This center provides world-class support in all aspects of electronic security, with particular emphasis on Internet security, vulnerability of

corporate networks, and protection against intruders. With clients such as the National Security Agency, Mitretek personnel are at the forefront of security issues.

4. Corporate Information Systems - This Mitretek organization is responsible for the design, installation, and management of Mitretek's corporate intranet. Personnel from this group will lend their extensive experience to the information systems transition team that will design, build, and install the NANP Administration information systems.

Exists in Recently Acquired Numbering Plan Experts. In the fall of 1996, we also began a pro-active and aggressive initiative to add to the Mitretek staff professionals expert in the administration of the NANP. The purpose was to add recognized numbering plan experts, thereby complementing Mitretek's existing, recognized experts in telecommunications systems and operations, and in large computer-based information systems development. As explained in Section 9.4 of this proposal, Mitretek engaged an executive search firm to assist in this task, as well as tasking our Office of Human Resources. As a result, we have already retained recognized numbering plan experts, who are working with us to prepare for implementation of the new NANP Administration. Specifically, the following three number plan professionals, recognized as experienced experts in NANPA and COCA functions, are working with Mitretek:

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NANPA Qualities and Attributes	
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Will Be Acquired Via Staffing Plan Already Implemented. Using an executive search firm and Mitretek's Office of Human Resources, we have already identified and contacted over 50 professionals in the numbering plan community. Many of these individuals have already provided us with resumes. As discussed in Section 9.4, it is the opinion of our search firm that Mitretek will be able to retain additional numbering plan professionals, as needed, to complement our existing staff after NANC recommendation of a new NANP Administration.

Prior to discussing each attribute specifically, please refer to Figure 3-3. Figure 3-3 is an enumeration of the qualities and attributes demonstrated by Mitretek in a representative set of 11 projects. For each of the projects enumerated in Figure 3-3, a summary project description is presented in Appendix I. An examination of these summary project